

## Zilgme, Katie (DPU)

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**From:** Erica Buster <EBuster@sunconnectusa.com>  
**Sent:** Thursday, March 3, 2022 4:29 PM  
**To:** Tohme, Kate (DPU); Zilgme, Katie (DPU)  
**Cc:** Gary Kassem; Nicolette Karakos  
**Subject:** DPU 20-75: Questions on 2/4/22 Information Request Responses

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Good afternoon,

I am not sure if this is the correct forum, but I have a few concerns regarding Eversource's responses (dated February 4, 2022) to the Department's information requests.

1. **Response 1.** It appears that certain groups are being delayed while the other groups finish their respective studies.
  - a. The Freetown Group finished their Steady State Analysis 5 months prior to Dartmouth and New Bedford. Yet, despite New Bedford's Group being double the size of Freetown with more complex upgrades and Dartmouth being close in size, they finished their Dynamic State Analysis about a day before Freetown. It looks like Freetown's progress was stalled for some reason.
  - b. When it comes to the release of System Impact Studies (SIS), again the schedules make little sense. Freetown is a month behind Marion-Fairhaven, despite being a smaller study and having the steady state and dynamic analysis completed first. Dartmouth and New Bedford are almost 2 full months apart on SIS receipt, despite finishing their studies on the same day.
  - c. Another example is the Cape dynamic analysis which wasn't due for completion until 2/25/21. They will receive their SIS almost 2 months prior to New Bedford who finished their dynamic study in December 2021.
  - d. We feel that the utility needs to be more transparent with these schedules. Based on the information at hand, it looks like they are picking and choosing which groups they want in line first with no reasonable explanation as to why for the developers.
2. **Response 2.** The Customer Notification date(s) quoted is in most cases 10 business days after the SIS completion per the DPU guideline. However, for New Bedford, this notification is expedited to only 3 days. If this is possible, why aren't we moving the other projects at that speed?
3. **The SMART program is structured in such a way that diminishes the project economics the later you are issued an ISA.** We feel that given this fact, the utilities need to be more transparent as to why they are holding some studies back and speeding others along.
  - a. With this in mind, does the Department have any timelines estimating how long the adjudicatory proceedings will take?
  - b. Will the Department be reviewing these CIPs as they are received or all together, so ISAs for all groups are issued simultaneously?

Best regards,  
Erica

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